

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ALBERT T. CARLISLE,

Plaintiff

v.

MATSON LUMBER COMPANY,
MATSON HARDWOODS, INC.,
DORA M. SQUATRITI, individually and
as EXECUTRIX OF THE ESTATE OF
MARION C. KINKEAD,

Defendants

No. C.A. 04-284 Erie
Judge Lancaster

AFFIDAVIT OF JAMES HALL

Before me, the undersigned Notary Public, this day, personally appeared James Hall, Consulting Forester, 69 South Main Street, Russell, Pennsylvania 16345, known to me, who being duly sworn according to law, deposes and says that based upon his own personal knowledge, the following statements are true and correct to the best of his knowledge, information and belief:

1. I have been engaged by Albert T. Carlisle, Plaintiff in the above captioned matter to appraise the timber and trees which have come into existence since May 18, 1969 on the Carlisle Farm located in Spring Creek Township, Warren County, Pennsylvania.
2. The Carlisle Farm encompasses approximately 1239.6 acres of land. Of the total acreage, approximately 779 acres are commercial forest land.
3. This property once had very high quality stands of red oak, black cherry, white ash, sugar maple, red maple, eastern hemlock, basswood, white pine and various other species.

4. Through good forest management, under the guidance of a professional forester, this area can be a highly productive, healthy and profitable forest.

5. In order to render an complete and accurate assessment of value of the timber and trees which have come into existence since May 28, 1969, I used performed the following:

A. General overview and boundary line check.

B. Typed the timber.

C. Took random plots using the following technique(s):

1. 44 1/10th Acre plots

D. Collected data regarding:

1. Species of trees.

2. Quality of trees.

3. Quantity of trees.

4. Diameter Breast High

E. Referred as needed to the following materials.

1. Silvah Growth Projection Exhibit 1

2. PA Woodlands Timber Market Report - Values 2nd Qtr 2005

3. Compound Interest Formula.

OPINION OF VALUE

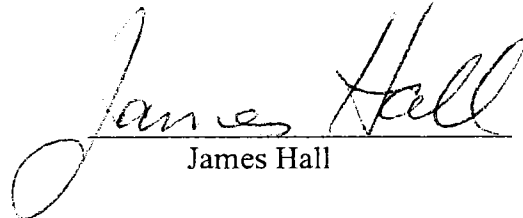
6. I have considered an area of 650 acres of forested land excluding the timber located in waterways.

7. It is my opinion to a reasonable degree of certainty that the present value of the timber and trees on the Carlisle property which have come into existence since May 28, 1969 is

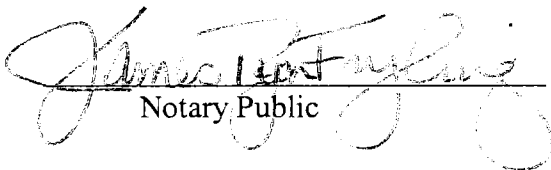
\$ 388,050.00.

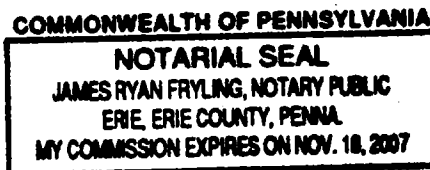
8. It is my opinion to a reasonable degree of certainty that the future value of the timber and trees on the Carlisle property which have come into existence since May 28, 1969 is

\$ 3,506,100.00.


James Hall

Subscribed and sworn to before me
this 22nd day of August, 2005


Notary Public



SILVAH -- SILVICULTURE OF ALLEGHENY HARDWOODS - V5.00
STAND SUMMARY, PRESCRIPTION, AND MANAGEMENT SIMULATOR PROGRAM
DEVELOPED BY THE NORTHEASTERN FOREST EXPERIMENT STATION, IRVINE, PA.

OWNER/AGENCY -- carlisle
FOREST/PROPERTY --
COUNTY/DISTRICT -- spring creek
COMPT - STAND --
ACRES -- 1.00
STAND AGE -- 20
SITE -- UNKNOWN
sapling evaluation

DATE TALLIED: JUL/ 5
DATE PRINTED: 19/AUG/2005
FILE: C:\SILVAHV5\sample2.SIL
DEFAULT: SILVAH.DEF
TYPE: ALLEGHENY HARDWOOD
SIZE: SMALL POLE
DENSITY: 50 TO 80 %

OVERSTORY CRUISE INFORMATION

Overstory data is from an individual tree tally fixed plot cruise,
using a .010 acre plot, and with trees tallied by
1 inch dbh classes, heights, and pulp & cull grades only.

Overstory data based on 44. plots;
0. additional plots needed to reach 15 % of the mean;
32. additional plots needed to reach 10 % of the mean.

Mean basal area is 48. plus or minus 6. square feet per acre
at 90 % confidence (13. % of mean).

UNDERSTORY CRUISE INFORMATION

Data on advance regeneration, site limits, and understory was not collected.

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FOREST/PROPERTY --
 COMPT - STAND --

DATE PRINTED: 19/AUG/2005
 FILE: C:\SILVAHV5\sample2.SIL

SIMULATED STAND DEVELOPMENT

YRS	NO. TREES	BASAL AREA	REL DEN	DIA MER	% CAP	% M&B	% OAK	TOT CDS	PULP CDS	MBF	\$	NET GROWTH	MORT
0	1150	48	54	8.0	35	40	0	3	3	.0	6		
5	1107	62	63	8.5	36	39	0	5	4	.3	33	2.67	.11
10	1064	76	72	8.8	37	37	0	8	6	.7	83	2.82	.13
15	1022	90	80	9.4	39	36	0	11	9	1.2	197	2.93	.14
20	879	103	85	10.1	39	35	0	14	12	1.8	397	2.51	.59
25	792	116	90	10.9	41	34	0	18	14	2.8	731	2.60	.46
30	726	129	96	11.6	42	33	0	22	16	4.1	1281	2.62	.42
35	613	140	99	12.4	43	32	0	25	17	5.6	2093	2.20	.80
40	532	150	102	13.2	44	31	0	29	19	7.2	3058	2.02	.79
45	469	159	105	14.0	45	31	0	32	20	8.7	4155	1.81	.83
50	418	167	107	14.7	45	30	0	35	20	10.2	5394	1.59	.88

597/Acre

Compound Interest 4.5%

EXHIBIT

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DATE PRINTED: 19/AUG/2005
FILE: C:\SILVAHV5\sample2.SIL

SIMULATED PRODUCT YIELD

YRS	DATE	TOTAL CORDS	PULP CORDS	MBF SAW	\$ TOTAL

INITIAL STAND					
0	5	2.8	2.8	.0	6.
FINAL STAND					
50	55	34.9	20.4	10.2	5394.

TOTAL YIELD		34.9	20.4	10.2	5394.

James Hall, Consulting Forester

89 S. Main St. - Russell, PA 18345
Phone 814-757-4488 ~ Fax 868-508-7474
management plans - appraisals - timber sales

QUALIFICATIONS

I have practiced good forest management since September 1963 on both public and private land. I have constantly taken and taught courses on forestry related subjects in order to keep my skills current.

My strongest assets are a dedication to good forestry practices and integrity in dealing with landowners.

WORK HISTORY

1963-1966

Service Forester, Commonwealth of Pennsylvania

I worked with private landowners to get good forestry practices on their land. This involved writing management plans, marking timber, planting trees and all other related activities.

1966-1968

Management Forester, Commonwealth of Pennsylvania

I worked on State Forest Land writing management plans, conducting timber sales, providing recreational opportunities and all other related activities.

1968-1993

Assistant District Forester, Commonwealth of Pennsylvania

I was responsible for all forest management work on both public and private land conducted by the Pa. Bureau of Forestry in Erie, Crawford, Forest, Warren and Venango counties. I was also responsible for forest fire prevention and control; Gypsy Moth spraying; snowmobile program; and other related activities.

1993-Present

Consulting Forester. Self employed

I work for private landowners helping them reach their goals..

EDUCATION

1959-1963

Bachelor of Science in Forest Management Penn State University

ADDITIONAL COURSEWORK AND TRAINING

Law Enforcement
Labor Relations
Prescribed Fire Management
Wildlife Habitat Management

EXHIBIT

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Watershed Management

Effects of Soils and geology on Planning and Development
Allegheny Hardwood Silviculture
Fire Business Management
Wetland Delineation
Soil and Erosion Control Workshop

Member of: Pa. Forestry Association
~~Pa. Deer Forest Committee~~
Northwest Pa. Woodland Owners Association